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Local Counsel for Defendant Trans Union, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHNNY WANG, an individual, on his own behalf and on behalf of others similarly situated, Plaintiffs,)	CASE NO. 3:09-cv-04797-SI
vs.)	
ASSET ACCEPTANCE, LLC, and TRANS UNION, LLC, Delaware limited liability companies, and DOES 1-100, inclusive, Defendants.)	STIPULATION AND [PROPOSED] ORDER THAT DEFENDANT TRANS UNION, LLC BE DEEMED A PARTY TO THE EXISTING STIPULATED PROTECTIVE ORDER

Plaintiff Johnny Wang, an individual, on his own behalf and on behalf of all others similarly situated (“Plaintiff”) and Defendants, Asset Acceptance, LLC (“Asset Acceptance”) and Trans Union, LLC (“Trans Union”) (collectively, the “Parties”), by counsel, pursuant to **STIPULATION AND [PROPOSED] ORDER THAT TRANS UNION BE DEEMED A PARTY TO THE STIPULATED PROTECTIVE ORDER – 3:09-CV-04797-SI**

1 Local Rule 7.12 hereby submit their Stipulation And [Proposed] Order That Defendant Trans
2 Union, LLC Be Deemed A Party To The Existing Stipulated Protective Order [Doc. No. 45]
3 (the “Stipulation”).

4 In support of the Stipulation, the Parties state:

5 1. On April 9, 2010, the Stipulated Protective Order [Doc. No. 45] was entered.

6 2. On April 29, 2010, Plaintiff filed his First Amended Class Action Complaint
7 [Doc. No. 49] in which he added Trans Union as a defendant.

8 3. The Parties desire to add Trans Union as a “Party” to the Stipulated Protective
9 Order, as that term is defined in the Order.

10 4. To that end, the Parties, by counsel, hereby stipulate that Trans Union is a
11 “Party,” as that term is defined by the Stipulated Protective Order, and all the terms of the
12 Stipulated Protective Order shall apply to Trans Union as of the date of this Order.

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**STIPULATION AND [PROPOSED] ORDER THAT TRANS UNION BE DEEMED A PARTY TO THE STIPULATED
PROTECTIVE ORDER – 3:09-CV-04797-SI**

1 SO STIPULATED by:

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3 Date: July 20, 2010

s/Robert J. Schuckit
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Lead Counsel for Defendant Trans Union, LLC

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11 Date: July 20, 2010

s/Ethan Preston (with permission)
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Lead Counsel for Plaintiff Johnny Wang, et al.

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19 Date: July 20, 2010

s/Tomio Buck Narita (with permission)
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Lead Counsel for Defendant Asset Acceptance, LLC

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STIPULATION AND [PROPOSED] ORDER THAT TRANS UNION BE DEEMED A PARTY TO THE STIPULATED
PROTECTIVE ORDER – 3:09-CV-04797-SI

[PROPOSED] ORDER

Pursuant to the Stipulation of the Parties and for good cause there appearing, IT IS
HEREBY ORDERED as follows:

1. Defendant Trans Union, LLC is deemed a “Party,” as that term is defined by the
Stipulated Protective Order.

2. All the terms of the Stipulated Protective Order shall apply to Defendant Trans
Union, LLC as of the date of this Order.

PURSUANT TO STIPULATION,
IT IS SO ORDERED.

Dated: _____



Hon. Susan Illston, Judge
U.S. District Court
Northern District of California

STIPULATION AND [PROPOSED] ORDER THAT TRANS UNION BE DEEMED A PARTY TO THE STIPULATED
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